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 Attorneys for Defendant  
*The Vons Companies, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEREIDA HRABE-KINZER, individually;	)	Case No. 2:24-cv-00691-ART-MDC
	)	
Plaintiff,	)	
vs.	)	<b>AMENDED</b>
	)	<b><u>STIPULATION AND ORDER TO</u></b>
THE VONS COMPANIES, INC., dba Vons	)	<b><u>EXTEND DISCOVERY DEADLINES</u></b>
Grocery Co #1970, a foreign limited-liability	)	
company; DOE EMPLOYEE; ROE	)	<b>(Fifth Request)</b>
OWNER/OPERATOR; DOE INDIVIDUALS	)	
2-10; ROE BUSINESS ENTITIES 2-10,	)	
inclusive jointly and severally,	)	
	)	
Defendants.	)	

Pursuant to Local Rules of Practice for the United States District Court for the District of Nevada (“LR”) 26-3, it is hereby stipulated and agreed by and between the parties hereto, by and through their respective counsel that the discovery deadlines shall be extended in this matter by an additional sixty (60) days. The parties propose the following revised discovery plan:

Pursuant to Local Rule 6-1(b), the Parties hereby aver that this is the fifth discovery extension requested in this matter. Further: 1) there is no danger of prejudice as the Parties stipulate the extension; 2) a sixty (60) day extension will not impact the trial date because the same has not been scheduled; and 3) the requested extension is made in good faith by both Parties.

*Pioneer Investment Services v. Brunswick Associate’s, Ltd.*, 507 U.S. 380, 395 (1993).

**I. DISCOVERY COMPLETED TO DATE**

The parties have participated in the following discovery to date:

1. The parties have conducted a Rule 26(f) conference and served their respective Rule 26(a)(1) disclosures.

2. Plaintiff's Fed. R. Civ. P. 26(a)(1) initial disclosures;
3. Plaintiff's First Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
4. Plaintiff's Second Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
5. Plaintiff's Third Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
6. Plaintiff's Fourth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
7. Plaintiff's Fifth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
8. Plaintiff's Sixth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
9. Plaintiff's Seventh Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
10. Plaintiff's Eighth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
11. Plaintiff's Ninth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
12. Plaintiff's Tenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
13. Plaintiff's Eleventh Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
14. Plaintiff's Twelfth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
15. Plaintiff's Thirteenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
16. Plaintiff's Fourteenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
17. Plaintiff's Fifteenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
18. Defendant's Fed. R. Civ. P. 26(a)(1) initial disclosures;
19. Defendant's First Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
20. Defendant's Second Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
21. Defendant's Third Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures;
22. Plaintiff's First Set of Interrogatories to Defendant;

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- 1 23. Plaintiff's First Set of Requests for Production of Documents to Defendant;
- 2 24. Plaintiff's First Set of Requests for Admissions to Defendant;
- 3 25. Defendant's Responses to Plaintiff's First Set of Interrogatories to Defendant;
- 4 26. Defendant's Responses to Plaintiff's First Set of Requests for Production of
- 5 Documents to Defendant;
- 6 27. Defendant's Responses to Plaintiff's First Set of Requests for Admissions to
- 7 Defendant;
- 8 28. Plaintiff's Second Set of Interrogatories to Defendant;
- 9 29. Plaintiff's Second Set of Requests for Production of Documents to Defendant;
- 10 30. Plaintiff's Second Set of Requests for Admissions to Defendant;
- 11 31. Defendant's Responses to Plaintiff's Second Set of Interrogatories to Defendant;
- 12 32. Defendant's Responses to Plaintiff's Second Set of Requests for Production of
- 13 Documents to Defendant;
- 14 33. Defendant's Responses to Plaintiff's Second Set of Requests for Admissions to
- 15 Defendant;
- 16 34. Plaintiff's Third Set of Requests for Production of Documents to Defendant;
- 17 35. Correspondence to the Current Property Owner relating to Coordinating Site
- 18 Inspection;
- 19 36. The Parties stipulated to a Confidentiality and Protective Order;
- 20 37. Defendant took Plaintiff's deposition on November 26, 2024;
- 21 38. Plaintiff's retention of forensic medical expert, Thomman Kuruvilla;
- 22 39. Plaintiff's retention of safety expert, John Peterson.
- 23 40. Defendant's Responses to Plaintiff's Third Set of Requests for Production of
- 24 Documents to Defendant;
- 25 41. Plaintiff's Sixteenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
- 26
- 27
- 28

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42. Plaintiff's Seventeenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
43. Plaintiff's Eighteenth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
44. Defendant's Fourth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
45. Defendant's Fifth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
46. Defendant's Sixth Supplement to Fed. R. Civ. P. 26(a)(1) initial disclosures.
47. Defendant's Supplemental Responses to Plaintiff's Second Set of Requests for

Production of Documents to Defendant;

48. Defendant's Supplemental Responses to Plaintiff's Third Set of Requests for
- Production of Documents to Defendant;

49. Plaintiff's disclosure of Dr. Thomman Kuruvilla's forensic medical expert report.

**50. Deposition of Keitha Jackson.**

**51. Deposition of Gary Quesnell.**

**52. Defendant's disclosure of prior claim history notes.**

## II. DISCOVERY REMAINING TO BE COMPLETED

1. Deposition of Defendant's 30(b)(6);
2. Depositions of former store employee Kalya Todora and potentially other current/former employees of Defendant.
3. Initial Designation of Experts;
4. Rebuttal of Experts;
5. Deposition of Expert Witnesses;
6. Depositions of other fact witnesses;
7. Supplemental Fed. R. Civ. P. 16.1 disclosures;
8. Supplemental written discovery responses;
9. Supplemental expert disclosures; and
10. Any additional discovery necessary as the parties proceed through discovery.

**III. REASONS WHY DISCOVERY NOT COMPLETED WITHIN TIME SET BY DISCOVERY PLAN**

Defendant recently passed its busiest season. Because of the same, store employee(s) and/or corporate 30(b)(6) witness(es) had not been available to sit for depositions. The parties have successfully conducted the depositions of two of the three former employees of the Von's grocery store: Keitha Jackson and Gary Quesnell. The Parties are actively attempting to coordinate and schedule the deposition of Kalya Todora – the remaining former employee of the Von's grocery store where the alleged incident occurred. The Parties are actively working to schedule Defendant's 30(b)(6) witnesses as well.

Secondly, Defendant was recently informed that Plaintiff was recommended to seek treatment with a podiatrist. Accordingly, Defendant will need to collect additional medical records and retain additional experts as appropriate.

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**IV. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

Based on the foregoing, the proposed schedule for completing discovery is as follows:

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	07.07.2025	<b>09.05.2025</b>
Initial Expert Disclosures	07.07.2025	<b>09.05.2025</b>
Rebuttal Expert Disclosures	08.06.2025	<b>10.05.2025</b>
Discovery Cut-Off Date	10.03.2025	<b>12.02.2025</b>
Dispositive Motions	11.03.2025	<b>01.02.2026</b>
Joint Pre-trial Order, if no Dispositive Motions	12.02.2025	<b>02.02.2026<sup>1</sup></b>

Dated \_\_ day of June 2025.

Dated 26<sup>th</sup> day of June 2025.

**RICHARD HARRIS LAW FIRM**

**BACKUS | BURDEN**

/s/ Jonathan B. Lee  
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*Attorneys for Defendant The Vons Companies, Inc.,  
d/b/a Vons Grocery Co.*

**ORDER - Case No. 2:24-cv-00691-ART-MDC**

**IT IS SO ORDERED.**

United States Magistrate Judge

6-27-25

DATED: June 23, 2025.

Respectfully Submitted,

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By: /s/ Jacquelyn Franco

Jack P. Burden, Esq.

Jacquelyn Franco, Esq.

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*Attorneys for Defendant*

*The Vons Companies, Inc.*

*From: Jonathan Lee <[jlee@richardharrislaw.com](mailto:jlee@richardharrislaw.com)>*

<sup>1</sup> 60 days from 12.02.2025 falls on a Saturday, 01.31.2026.

1 Sent: Thursday, June 26, 2025 12:47 PM  
2 To: Hope Conners <[hopeconners@backuslaw.com](mailto:hopeconners@backuslaw.com)>; Jacquelyn Franco  
3 <[jacquelynfranco@backuslaw.com](mailto:jacquelynfranco@backuslaw.com)>  
4 Subject: Re: Activity in Case 2:24-cv-00691-ART-MDC Hrabe-Kinzer v. The Vons Companies,  
5 Inc. Order on Stipulation

6 You have my consent to file with the court.

7 Jonathan Lee  
8 Lawyer - PartnerDirect (702) 444-4429



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